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Dear Administrator Whitman

As private citizens who live not only in a county with remarkably high cancer and, asthma incidence but reside a mere 1.1 miles distant from the currently sole producer of Benzotriazole in the United States, we find the last December 31st proposal of the Benzotriazoles Coalition, James Cooper, Executive Director, wholly inadequate. Our neighborhood suffers even higher rates of illness and odor complaints than Hamilton (Cincinnati) county.

Independence, motivation and risk are my primary concerns with the proposal.

(1) Mr. Cooper's letter accompanies a paucity of research summaries already completed on Benzotriazoles. While scant, some of this past research also "suggests" (but is not "conclusive") the experiments induced cancers in rats and mice. Three of eight experimental groups incurred cancers ($P=.024$; $P=.001$; $P=.01$). The Coalition's submission summarily dismisses the need for further research in these categories.

(2) The Coalition proposal suggests further study only in the area of "developmental" toxicity. While we can applaud the recognition of the need, the motivation for the Coalition's research proposal is untenable. In his proposal letter, Mr. Cooper states that the "coalition has reasoned that the most fair, practical way to move forward and fulfill its entire commitment to the HPV Challenge, is through regulatory action, such as rulemaking under TSCA Section 4". The TSCA is the Toxic Substance Control Act. The motivation here is only for trade protection from low cost Chinese imports, as Mr. Cooper describes and proposes in his letter. Is this a quid pro quo for the coalition to move forward? The Coalition already has data indicating the Benzotriazole study results are "suggestive" as a cancer cause.

(5) Is the Coalition hoping to demonstrate toxic "developmental" effects? If so, they will only be able to infer such from considerable interpolation and extrapolation in their proposed design. While this may yield import protection, what protection does the local and highly populated community receive?

(6) The Coalition seems to expect to participate in the research and receive Federal monies "to carry out the work proposed in the test plan, but assistance will be needed by (sic*) the Agency to achieve these objectives."

(7) Our community is already having severe discomfort from the tolytriazole - benzotriazole production process at PMC's subsidiary Cincinnati Specialties, Inc. The odors drive us indoors and are, at the least, highly irritating to our eyes and noses. Plant management and local air quality authorities have been unresponsive to our pleas.

CONCLUSION: The Benzotriazoles Coalition proposal's cover letter alone is prima facie evidence that the proposal should be dismissed. Because of the risks involved with continued (at least 26 years) public exposure to these chemicals, only truly independent research is needed. The Cincinnati community has ample research capability. The HPV program should expect to fund nothing less than quality, independent research.

Sincerely,

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*We can only infer the meaning is "from" not "by".